

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EBUDDY TECHNOLOGIES B.V.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 20-1501 (RGA) (CJB)
	)	
LINKEDIN CORPORATION,	)	
	)	
Defendant.	)	

**JOINT MOTION TO CONTINUE THE STAY PENDING *INTER PARTES* REVIEW**

Plaintiff eBuddy Technologies B.V. (“eBuddy”) and Defendant LinkedIn Corporation (“LinkedIn”) jointly file this motion to continue the current stay of these proceedings pending *inter partes* review of all four patents-in-suit: U.S. Patent Nos. 8,230,135 (the “’135 Patent”), 8,402,179 (the “’179 Patent”), 8,510,395 (the “’395 Patent”), and 9,584,453 (the “’453 Patent”). Good cause exists for the parties’ joint motion, including as follows:

LinkedIn has filed petitions for *inter partes* review of all four patents-in-suit. On May 17, 2022, the Patent Trial & Appeal Board (“PTAB”) issued institution decisions for the ’395 Patent and ’453 Patent instituting *inter partes* review for those two patents. IPR2022-00176 (’395 Patent), Paper 13; IPR2022-00177 (’453 Patent), Paper 13. On July 13, 2022, the PTAB issued institution decisions for the remaining two patents, the ’135 Patent and ’179 Patent, also instituting *inter partes* review for those two patents. IPR2022-00164 (’135 Patent), Paper 18; IPR2022-00165 (’179 Patent), Paper 20. Accordingly, the PTAB is expected by statute to issue final written decisions by May 17, 2023, and July 13, 2023, for the patents-in-suit, respectively.

The Court previously granted the parties’ joint motion to stay this action pending receipt of the institution decisions for the ’135 Patent and ’179 Patent. D.I. 145.

To conserve resources of both the Court and the parties, eBuddy and LinkedIn jointly move the Court to continue the stay pending issuance by the PTAB of its final written decisions for the *inter partes* reviews of the four patents-in-suit. See D.I. 108 (Court Order on pre-institution motion to stay indicating the Court's view that there would be a "good chance" the Court stays the action if all four *inter partes* reviews are instituted, even if such a motion were opposed). The parties will jointly notify the Court once the PTAB issues final written decisions in all four *inter partes* review proceedings, within five (5) business days of the last-to-issue decision, to provide a summary of the status of the asserted claims and the parties' proposal(s) for going forward. Both parties respectfully reserve the right to request a continuance of the stay at that time.

FARNAN LLP

*/s/ Brian E. Farnan*

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July 20, 2022

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v.	)	C.A. No. 20-1501 (RGA) (CJB)
	)	
LINKEDIN CORPORATION,	)	
	)	
Defendant.	)	

**[PROPOSED] ORDER GRANTING JOINT MOTION TO CONTINUE STAY  
PENDING *INTER PARTES* REVIEW**

WHEREAS, Plaintiff, eBuddy Technologies B.V. (“eBuddy”), and Defendant, LinkedIn Corporation (“LinkedIn”) (collectively, the “Parties”) have jointly moved to continue the stay of this action pending *inter partes* review of the four patents-in-suit; and

WHEREAS, the Court having considered the motion and the arguments of counsel;

IT IS THEREFORE ORDERED that the Motion be GRANTED, as follows:

1. All deadlines in this case shall be stayed pending issuance by the PTAB of its final written decisions for the *inter partes* reviews of the patents-in-suit; and
2. The Parties shall file a joint status report of no more than two single-spaced pages within five (5) business days of receipt the last-to-issue final written decision in the *inter partes* review proceedings on the four patents-in-suit.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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J.